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Mr. David Szymanski
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation
270 Michigan Avenue – 3rd Floor
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**RE: 2017 Periodic Review Report
Mineral Springs Road Former Manufactured Gas Plant Site
NYSDEC Site #V00195**

Dear Mr. Szymanski:

National Fuel Gas Distribution Corporation (National Fuel) completed construction on the remedial action for the Mineral Springs Road Former Manufactured Gas Plant (MGP) Site (Site) in 2001. Since then, National Fuel has performed operations and maintenance (O&M) activities for the remedy in accordance with the Final Engineering Report, Volume II – Operations and Maintenance (O&M) Plan, dated May 2002 (O&M Plan) for the project. Those activities have included preparation of annual O&M reports, which have been submitted since 2002. Because of changes in New York State Department of Environmental Conservation (NYSDEC) reporting requirements, AECOM has prepared this Periodic Review Report (PRR) on behalf of National Fuel rather than an O&M Report to meet the reporting requirements of the O&M Plan.

1. Introduction

The Former MGP was constructed in the early 1920s and operated until the 1960s. Coal and oil gasification wastes, specifically coal tar hydrocarbons and blue-stained purifier residuals, were generated during plant operation. Investigations were performed between 1990 and 1998 to evaluate environmental conditions at the site. Those investigations identified impacts to soil and groundwater by MGP residues, including organic constituents, dense non-aqueous phase liquids (DNAPL), and cyanide. Remedial activities including excavation, capping, DNAPL recovery, and institutional controls have been performed since 1997 to address these impacts.

This PRR presents and evaluates the results of annual O&M activities performed at the Site from September 16, 2016 to September 16, 2017, and analytical data from 2001 (remedial action completion) through August 2017. The annual O&M activities include annual inspections, groundwater and surface water monitoring, and maintenance and repair of engineering controls. In addition to the annual O&M activities, supplemental groundwater and surface monitoring was completed this reporting period, as further described below. Data collected during the performance of these activities and an evaluation of the remedy effectiveness is presented below.

2. Site Overview

The Site lies in a flat, mixed industrial and residential area of West Seneca (and Buffalo), New York. The Site is currently an active National Fuel service center. Figure 1 shows the facility layout.

The stratigraphy of the site consists of 4- to 8-feet of soil and fill, approximately 10-feet of a nearly continuous upper confining clay layer (UCL), 10- to 15-feet of groundwater-bearing silt, sand, and gravel, a lower confining clay layer (LCL), and bedrock. Overburden groundwater is typically encountered 5- to 12-feet below ground surface and fluctuates seasonally approximately 2 feet. Overburden groundwater flow is generally to the northwest towards Mineral Springs Road, Calais Street, and the Buffalo River. Average overburden groundwater velocity across the site is calculated to be approximately 0.06 feet per day.

In 1990 and 1995, investigations and soil remediation activities were performed near an oil-water separator pit in the central area of the site. In 1997 and 1998, a Preliminary Site Assessment (PSA) and a follow-up PSA Addendum were conducted. The assessments concluded that soil and groundwater at the site were impacted by MGP residues including dense non-aqueous phase liquids (DNAPL) and cyanide.

An interim remedial measure (IRM) was conducted at the Site in December 1997. During the IRM, 407 tons of purifier residuals were removed from the southwest corner of the Site. On August 4, 1998 National Fuel submitted a Voluntary Cleanup Agreement (VCA) program application. VCA number B9-0538-98-08 was signed by National Fuel on June 2, 1999 and by NYSDEC on November 7, 1999. A Remedial Design Work Plan was subsequently developed by National Fuel and NYSDEC. From May 2000 to June 2001, the Remedial Design Work Plan was implemented and the following remedial tasks were completed:

- Excavation and offsite disposal of 32,200 tons of contaminated soil, rubble, and purifier waste.
- Construction of engineering controls including 39,369 square feet of clay cap, 76,144 square feet of geomembrane and 130,890 square feet of asphalt cap over areas where purifier waste was located.
- Capping of hydrocarbon seeps within the Eastern Drainage Ditch (EDD), including construction of 640 linear feet of geosynthetic cap and 750 linear feet of clay cap.
- Installation of additional chain link security fence around the site perimeter.
- Implementation of site use and deed restrictions.
- Collection, treatment, and disposal of 207,000 gallons of contaminated groundwater.

In January 1998, National Fuel performed a soil gas survey to evaluate potential exposures to workers inside buildings at the Site. The report concluded that the results did not indicate a significant potential for exposure by site workers to excessive concentrations of airborne constituents resulting from soil gas migration into occupied building spaces.

During the annual site inspection in April 2007, National Fuel identified a faint blue stain in surface gravel near Building 8. In July 2007, a soil investigation in the area identified a subsurface lens of bluish stained soils. Based on the results of the investigation, an IRM Work Plan was prepared describing an IRM to address the stained soil. The IRM Work Plan was submitted to NYSDEC in November 2008. The scope of the IRM included installation of a 24,000 square foot asphalt cap immediately to the east of the existing Building 3 East Asphalt Cap (B3EAC). Work to install the new cap took place in June and July 2008. The new cap is designated as the Building 8 West Asphalt Cap (B8WAC), as shown on Figure 1.

In July 2013, soil impacted with purifier wastes was observed in the southwestern corner of the site, outside of the perimeter fence on the western and southwestern site boundaries, near residential properties on Calais Street. National Fuel completed a series of Corrective Measure (CM) activities in the area where impacts were observed. CM activities to address purifier waste impacted soils in the southwest corner near the west property line were implemented in November 2013. CM

activities to remove fill materials that exceeded the NYSDEC Residential Soil Cleanup Objectives were implemented in October 2014. CM activities area is designated CM, as shown on Figure 1.

3. 2017 Site Activities

Routine O&M activities performed during 2017 include the following:

- Annual inspection on April 18, 2017.
- Groundwater monitoring events on April 18, 2017 and August 9-10, 2017.
- Submittal of groundwater and surface water monitoring reports on May 31, 2017 and October 27, 2017.
- Cap maintenance activities:
 - Mowing of Eastern Swale High-Density Polyethylene (HDPE) Cap (ESHC) and Clay Cap (CC);
 - Trapping and relocating of woodchucks that have burrowed into the CC and filling of the animal burrows;
 - Repair to Building 3 South Asphalt Cap (B3SAC); and,
 - Repair to Building 10 Asphalt Cap (B10AC).

Other environmental activities which were completed at the Mineral Springs Site in the period covered by this report include the following:

- Removal of an old concrete slab and petroleum impacted soils encountered beneath it located off the southeast corner of Building #10. Excavated soils remain on Site, pending analysis and approval for disposal.
- As requested by NYSDEC in response to the free cyanide exceedance of the NYSDEC Class D Surface Water Standard in the April 2017 SW-02 surface water sample, a supplemental surface water level measurement was obtained and supplemental groundwater and surface water samples were collected and analyzed during the August 2017 monitoring event.

An activity not completed during 2017 was the repair, by Norfolk Southern (NS) Railroad, of the damaged storm sewer adjacent to, but just outside of, the southern property line and the CC area. Based on the results of an investigation that determined that the storm sewer was outside of the CC engineering control and the National Fuel property, AECOM submitted a letter to the NYSDEC on October 29, 2015 recommending that NS be allowed to perform repair activities provided that they did not damage the CC. On December 2, 2015, the NYSDEC provided AECOM with email approval of that action. To date, NS has not yet performed this repair.

4. Evaluation of Remedy Performance, Effectiveness, and Protectiveness

The objectives of the remedial action performed at the Site include the following:

- Preventing human contact with compounds of concern (COC) in purifier waste, soil, and sediment.
- Preventing human contact or ingestion of COC in groundwater.
- Preventing leaching of COC from purifier waste to groundwater.
- Preventing leaching of COC from coal tar impacted soil to surface water.

The first two objectives were addressed by excavating soil and purifier waste, capping areas where purifier waste was left in place, capping coal tar residues in the EDD, and implementing institutional controls to limit site use, prevent use of groundwater, and provide protection for excavation workers.

The remaining two objectives are addressed by excavating soil and purifier waste, capping areas where purifier waste was left in place, capping coal tar residues in the EDD, and removing DNAPL.

The effectiveness of these remedial actions in meeting these objectives is evaluated by 1) performing an annual inspection to verify that engineering controls remain intact and that site use has not changed, and 2) by implementing a groundwater and surface water monitoring program.

4.1 Analytical Results

Groundwater and surface water monitoring was performed at the Mineral Springs Site semi-annually (in April and August) in 2017. The monitoring programs were performed in accordance with the 2002 O&M Plan. As part of the August 2017 monitoring event, a supplemental surface water level measurement was obtained and supplemental groundwater and surface water samples were collected and analyzed as described in the Revised Supplemental Groundwater and Surface Water Cyanide Monitoring letter submitted to NYSDEC on July 31, 2017.

An evaluation of the groundwater and surface water monitoring results from data collected during the 2017 monitoring events is presented in the following sections. The analytical data are compared to the NYSDEC Technical Operational and Guidance Series (TOGS) 1.1.1, Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations (June 1998). Details of the results of these monitoring events are presented in the April 2017 and August 2017 Groundwater and Surface Water Monitoring Reports, submitted to NYSDEC in May 2017 and October 2017, respectively.

The free cyanide results for the August 2017 sampling event were observed to be higher than the historic range of concentrations. National Fuel is currently conducting an independent third-party data validation for both the total and free cyanide analyses, as well as an audit at Pace Analytical Laboratories in Grand Rapids, Michigan. These independent investigations are being performed in an effort to determine if the free cyanide results are accurate or if other factors may have affected the total and free cyanide analytical results reported for the August 2017 sampling event. The unvalidated data are presented as reported from Pace Analytical in this report. Results of the data validation and any adjustments or qualification of the analytical results will be presented under separate cover.

Figures 2 and 3 provide groundwater contours indicating the direction of groundwater flow at the Site for April 2017 and August 2017, respectively. Appendix A presents the 2017 surface water and groundwater elevations and analytical results, as well as historic data from 1995 through 2016.

Upgradient Site Perimeter

Monitoring well MW-17 monitors groundwater quality upgradient of the Site remedial actions. The groundwater sample from this well is analyzed semi-annually for benzene, ethylbenzene, toluene, and xylene (BTEX), polycyclic aromatic hydrocarbons (PAHs), total cyanide, and free cyanide. No BTEX compounds were detected in either of the two sampling events. A summary of the PAH and cyanide detections follows:

- April 2017:
 - No PAH compounds were detected.
 - Total cyanide was detected at a concentration of 124 µg/L, below the NYSDEC Groundwater Standard of 200 µg/L. Free cyanide was not detected.

- August 2017:
 - Naphthalene was detected at a concentration of 0.45 J µg/L, below the NYSDEC Groundwater Guidance Value of 10 µg/L.
 - Total cyanide was detected at a concentration of 173 J+ µg/L, below the NYSDEC Groundwater Standard of 200 µg/L. Free cyanide was not detected.

Downgradient Site Perimeter

Six “sentinel” wells monitor groundwater quality downgradient of the Site remedial actions. These wells include MW-13, MW-14, MW-22 and MW-23 located just inside the northern property boundary near Mineral Springs Road and MW-20 and MW-21 located downgradient of the western Site boundary on Calais Street. The groundwater samples from these six wells are analyzed semi-annually for total and free cyanide. The results of monitoring in these wells are summarized below:

- April 2017: Five of the six wells had total cyanide concentrations above the NYSDEC Groundwater Standard of 200 µg/L. Detected concentrations ranged from 236 µg/L at MW-23 to 874 µg/L at MW-20.
- August 2017: Five of the six wells had total cyanide concentrations above the NYSDEC Groundwater Standard of 200 µg/L. Detected concentrations ranged from 150 J+ µg/L at MW-13 to 1,000 µg/L J+ at MW-20.

Free cyanide was detected as summarized below; however, there is no NYSDEC Groundwater Standard for free cyanide:

- April 2017: Free cyanide was detected in one well (MW-22) at a concentration of 12 µg/L.
- August 2017: Free cyanide was detected in all six wells at concentrations ranging from 22.6 µg/L at MW-13 to 166 µg/L at MW-23.

Monitoring wells MW-13 and MW-23 are also sampled once annually during August for BTEX and PAHs. The BTEX compound benzene is regularly detected in MW-13. A summary of the BTEX and PAH analytical results from the August sampling event follows:

- August 2017:
 - BTEX compounds were not detected in either MW-13 or MW-23.
 - Naphthalene was detected at a concentration of 0.44 J µg/L in well MW-13 and 0.46 J µg/L in well MW-23, below the NYSDEC Groundwater Guidance Value of 10 µg/L.

On-site Purifier Residuals Impacted Areas

Wells MW-12 and MW-16 monitor groundwater quality at the Eastern Swale HDPE Cap (ESHC) and the CC, respectively. These are locations of known subsurface deposits of purifier box residuals. These deposits were remediated by capping. Samples from these two wells are analyzed for total and free cyanide.

As summarized below, both wells had total cyanide groundwater concentrations above the NYSDEC Groundwater Standard of 200 µg/L during each sampling event. A summary of exceedances follows:

- April 2017: Total cyanide concentrations were reported as 536 µg/L at MW-12 and 1,570 µg/L at MW-16.
- August 2017: Total cyanide concentrations were reported as 1,700 J- µg/L at MW-12 and 1,690 J+ µg/L at MW-16.

Free cyanide was detected as summarized below; however, there is no NYSDEC Groundwater Standard for free cyanide:

- April 2017: Free cyanide concentrations were reported as 6.8 µg/L at MW-12 and 17 µg/L at MW-16.
- August 2017: Free cyanide concentrations were reported as 7.2 µg/L at MW-12 and 38.8 µg/L at MW-16.

On-site Hydrocarbon Impacted Areas

Monitoring wells MW-07, MW-10, MW-11A, and MW-19 monitor on-site groundwater quality downgradient of subsurface soils impacted with hydrocarbon NAPL. Wells MW-07 and MW-10 are downgradient of the Separator Pits Excavation (SPE); well MW-11A is adjacent to the drainage ditch cap; and well MW-19 is downgradient of the Northern and Eastern Tar Boils Excavations. Samples from these wells are analyzed for BTEX and PAH compounds.

A summary of BTEX detections for wells MW-07, MW-10, MW-11A, and MW-19 follows:

- April 2017: In each well one or more BTEX compounds were detected above the respective NYSDEC Groundwater Standards.
- August 2017: One or more BTEX compounds were detected above the respective NYSDEC Groundwater Standards in each well at MW-07, MW-11A, and MW-19. BTEX compounds were not detected in well MW-10 during the August sampling event.

Only two PAH compounds were detected above NYSDEC Groundwater Guidance Values in the wells summarized below:

- April 2017: PAH compound acenaphthene was detected in MW-07 at a concentration of 100 µg/L, above the NYSDEC Groundwater Guidance Value of 20 µg/L. Naphthalene was detected in MW-07 and MW-19 at 2,300 µg/L and 6,200 µg/L, respectively, above the NYSDEC Groundwater Guidance Value of 10 µg/L.
- August 2017: PAH compound acenaphthene was detected in MW-07 at a concentration of 100 µg/L, above the NYSDEC Guidance Value of 20 µg/L. Naphthalene was detected in MW-07 and MW-19 at 2,300 µg/L and 4,400 µg/L, respectively, above the NYSDEC Guidance Value of 10 µg/L.

Surface Water

Two surface water samples, SW-01 and SW-02, are collected from the NYSDEC Class D Stream running along the south side of the site. Sample SW-01 is collected near the storm sewer inlet near Building 14 to monitor concentrations of COC in surface water downgradient of the Site. Sample SW-02 is collected at the EDD near the Class D Stream to monitor surface water downgradient of the EDD Cap. Surface water samples are analyzed for BTEX, PAH, total and free cyanide. BTEX compounds were not detected in either surface water sample during either sampling event. PAH compounds were not detected in either surface water sample during either sampling event. A summary of total and free cyanide analytical results is presented below:

- April 2017:
 - Total cyanide was detected in the SW-01 surface water sample at a concentration of 25.5 µg/L and in the SW-02 surface water sample at a concentration of 253 µg/L, below the NYSDEC Class D Surface Water Standard of 9,000 µg/L.
 - Free cyanide was detected in the SW-01 surface water sample at a concentration of 11 µg/L and in the SW-02 surface water sample at a concentration of 72 µg/L. The free cyanide concentration in the SW-02 sample was above the NYSDEC Class D Surface Water Standard of 22 µg/L.

- August 2017:
 - Total cyanide was detected in the SW-02 surface water sample at a concentration of 195 J+ µg/L, below the NYSDEC Class D Surface Water Standard of 9,000 µg/L. Total cyanide was not detected in the SW-01 surface water sample located downstream of SW-02.
 - Free cyanide was detected in the SW-02 surface water sample at a concentration of 24.6 µg/L, above the NYSDEC Class D Surface Water Standard of 22 µg/L. Free cyanide was not detected in the SW-01 surface water sample located downstream of SW-02.

Supplemental Groundwater and Surface Water

As summarized above, free cyanide was detected in the SW-02 surface water sample above the NYSDEC Class D Surface Water Standard during the April 2017 sampling round. In response to the free cyanide exceedance, supplemental groundwater and surface water samples were collected and analyzed for total cyanide, free cyanide, total dissolved solids (TDS), and specific conductance, as follows:

- Existing locations:
 - MW-11A: A groundwater sample was collected for total cyanide, free cyanide, and TDS analyses at MW-11A. Specific conductance is already a standard parameter for groundwater samples.
 - SW-01 and SW-02: A surface water sample for TDS and specific conductance analyses was collected at existing surface water sample locations SW-01 and SW-02. Total cyanide and free cyanide are already standard parameters for surface samples at these locations.
- Supplemental locations:
 - SW-03, SW-04, and SW-05: Surface water samples for total cyanide, free cyanide, TDS, and specific conductance analyses were collected at new surface water monitoring locations SW-03, SW-04, and SW-05.

Analytical results for the supplemental samples are summarized as follows:

Sample Location	Total Cyanide (µg/L) [†]	Free Cyanide (µg/L) [†]	TDS (mg/L)	Specific Conductivity (mS/cm)
MW-11A	175	5.9	766	1.144*
SW-01	ND*	ND*	608	1.013
SW-02	195*	24.6*	554	0.839
SW-03	422	25.3	644	0.957
SW-04	ND	ND	876	1.527
SW-05	ND	ND	615	1.036

Notes:

*Routine O&M Sample

TDS – total dissolved solids

µg/L – micrograms per liter

mg/L – milligrams per liter

mS/cm – millisiemens per centimeter

[†] Results are being evaluated for accuracy through the data validation and laboratory audit.

Total cyanide was detected in groundwater at monitoring well MW-11A below the NYSDEC Groundwater Standard of 200 µg/L. Total cyanide was detected in surface water samples SW-02 and SW-03 below the NYSDEC Class D Surface Water Standard of 9,000 µg/L. Total cyanide was not detected in the upstream surface water samples SW-04 or SW-05 or the downstream surface water sample SW-01.

Free cyanide was detected in groundwater at monitoring well MW-11A. There is not a NYSDEC Groundwater Standard for free cyanide in groundwater. Free cyanide was detected in surface water samples SW-02 and SW-03 above the NYSDEC Class D Surface Water Standard of 22 µg/L. Free cyanide was not detected in the upstream surface water samples SW-04 or SW-05 or the downstream surface water sample SW-01.

TDS and specific conductivity do not have a NYSDEC Groundwater or Surface Water Standard or Guidance Value.

4.2 Conclusions – 2017 Analytical Results

With the exception of the August 2017 total and free cyanide results, the results of routine O & M groundwater and surface water monitoring show that COC concentrations for this period are consistent with data collected since remediation was completed. Concentrations of free cyanide in groundwater in wells at the downgradient property boundary in April 2017 appeared to be stable. The analytical results for free cyanide in August 2017 are not consistent with the range of concentrations measured in past years and are being evaluated for accuracy through the data validation and laboratory audit. Concentrations of total cyanide in downgradient wells remain at levels higher than NYSDEC standards. National Fuel will continue to monitor the data.

4.3 Conclusions – August 2017 Supplemental Monitoring Results

The following conclusions were made from the supplemental groundwater and surface water monitoring conducted in August 2017:

- The concentration of total and free cyanide was observed to be greater in surface water (where detected, i.e. SW-02 and SW-03) than in groundwater at MW-11A.

As stated above, the reported total and free cyanide results are being evaluated for accuracy through the data validation and laboratory audit. If warranted, additional supplemental sampling recommendations will be made following the completion of the data validation and audit. These recommendations will be proposed under separate cover.
- The groundwater elevation at monitoring well MW-11A was observed to be higher than the surface water elevation at location SW-02. Data collected show that there is a potential that a small, local groundwater mound may exist in the vicinity of monitoring well MW-11A (Figure 3).
- The TDS and specific conductivity results measured in the groundwater at MW-11A were similar to the values measured at the adjacent surface water location SW-02, as well as the other supplemental surface water locations, providing no definitive indication of influence to or from groundwater.

5. O&M Plan Compliance Report

The components of the O&M program for the Mineral Springs Site are established in the 2002 O&M Plan. These include groundwater and surface water monitoring, DNAPL recovery, annual inspections, maintenance and repair of engineering controls, and reporting. Details of this program

are described in the O&M Plan and summarized in Table 1. Table 2, taken from the O&M Plan (with updated information), summarizes the groundwater and surface water monitoring program. O&M activities completed since the last PRR (dated October 14, 2016) include the following:

- Annual inspection on April 18, 2017.
- Groundwater and surface water monitoring events on April 18, 2017 and August 9 and 10, 2017.
- Continued evaluation of the DNAPL recovery well system with only trace amounts (estimated at less than 1%) of DNAPL observed in April 2017 and August 2017.
- Submittal of the Groundwater and Surface Water Monitoring Reports for the monitoring events performed in 2017.
- Performance of maintenance activities to address issues identified during the annual inspection.

During the April 2017 annual inspection, observations of site conditions were recorded. The inspection checklists are included as Appendix B. Photographs taken during the inspections are included in Appendix C, which also includes a photo location figure. An Institutional and Engineering Controls Certification Form is included in Appendix D.

5.1 2017 Annual Site Inspection

Clay Caps

Clay caps, designated CC on Figure 1, are located southeast of Building 14 and in the Eastern Drainage Ditch north of the northern culvert and south of the southern culvert, designated EDD.

As discussed previously, soil has been disturbed just beyond the southern edge of the CC southeast of Building 14 by the collapse of a storm sewer on adjacent property. A boring program performed as described in a Corrective Measure Work Plan determined the location of the clay cut-off wall and outer edge of the clay cap. Based on those borings, it was determined that the cut-off wall and clay cap are not in the area of soil disturbed by the damaged storm sewer, and both are intact. In April 2015, mechanical equipment was used to place stone in the area of the collapse to prevent any further loss of the overlying soils. During that work, the surface of the CC was disturbed. That area has since re-established a sufficient vegetative cover. This year's site inspection found that the engineering control is in place and effective.

The CC area has been mowed periodically to prevent tree growth. No blue-stained soils were observed during the inspection. The surface of the CC was intact and no sink holes were observed. An animal burrow was observed on the CC. The animal has been trapped and relocated, and the burrow has been filled.

In the clay-capped sections of the EDD, no erosion, animal burrows, or hydrocarbon sheen were observed. Warning signs were in place and no woody plants were observed near the clay portion of the cap.

HDPE Caps

Geomembrane caps, constructed of 40-mil HDPE and soil or stone cover, are located in the Eastern Swale and in the EDD between the culverts. These caps are designated ESHC and EDD cap, respectively.

The ESHC has been mowed periodically. No geotextile, rutting, or blue-stained surface soil were visible within the limits of the cap. A short length of corrugated drainage pipe is exposed within the

French drain portion of the ESHC, at the western end. The pipe is undamaged and its exposure does not impair the proper functioning of the ESHC. The pipe will be reset to proper grades.

The EDD cap includes an 18-inch diameter HDPE surface water drain pipe. There was no erosion, animal burrows, deep-rooted perennial plant species, or hydrocarbon sheen observed. The “no dig” signage was in place.

Asphalt Caps

Asphalt caps are located south and east of Building 3, designated B3SAC and B3EAC respectively; north and south of the Eastern Swale, designated ESNAC and ESSAC; to the north of Building 10, designated B10AC; and, west of Building 8, designated B8WAC.

One small area of significant cracking was observed in the B10AC and some areas of significant cracking were observed in the B3SAC. These areas have since been repaired and sealed since the inspection.

Other Areas

Throughout the remainder of the site, no tar boils or blue-stained soils were observed.

The compacted backfill placed in the various former Tar Boils and Separator Pit excavations has been maintained as necessary to assure run-off control. These areas showed no ponding of surface water.

No hydrocarbon sheens were observed in the Class D Stream or the EDD.

Groundwater and Surface Water Monitoring

Groundwater and surface water monitoring results for the April 2017 and August 2017 monitoring events are presented in the groundwater and surface water monitoring reports, prepared by AECOM and submitted to NYSDEC on May 31, 2017 and October 27, 2017, respectively. A summary of groundwater and surface water analytical results for the period between August 1995 and August 2017 is tabulated in Appendix A. Sampling locations are shown on Figures 2 and 3 for the April 2017 and August 2017 monitoring event, respectively. Discussions of the 2017 monitoring results for specific areas of the Site have been presented in Section 4 of this report.

5.2 Conclusions

Since the last PRR, O&M activities have been performed at the Site as specified in the O&M Plan. The deficiencies identified in the annual inspection have been addressed. Engineering controls are intact, and the combination of institutional and engineering controls are effective. Institutional and engineering controls implemented during past remedial actions are in place and effective.

With the exception of the August 2017 total and free cyanide results, the results of routine O & M groundwater and surface water monitoring show that COC concentrations for this period are consistent with data collected since remediation was completed. Concentrations of free cyanide in groundwater in wells at the downgradient property boundary in April 2017 appeared to be consistent with historical values. The analytical results for free cyanide in August 2017 are not consistent with the range of concentrations measured in past years and are being evaluated for accuracy through the data validation and laboratory audit. Concentrations of total cyanide in downgradient wells remain at concentrations higher than NYSDEC standards. National Fuel will continue to monitor the data.

6. Overall PRR Conclusions and Recommendations

As discussed above, the O&M program is being implemented in accordance with the provisions of the Site O&M Plan. The results of the site inspection indicate that the combination of institutional and engineering controls remain intact and continue to be effective in meeting remedial objectives.

With the exception of the August 2017 total and free cyanide results, the results of routine O & M groundwater and surface water monitoring show that COC concentrations for this period are consistent with data collected since remediation was completed. Concentrations of free cyanide in groundwater in wells at the downgradient property boundary in April 2017 were consistent with historic concentrations. The analytical results for free cyanide in August 2017 are not consistent with the range of concentrations measured in past years and are being evaluated for accuracy through the data validation and laboratory audit. Concentrations of total cyanide in downgradient wells remain at levels higher than NYSDEC standards. National Fuel will continue to monitor the data.

The results of the supplemental groundwater and surface water monitoring completed during the August 2017 monitoring event show the following:

- The concentration of total and free cyanide was observed to be greater in surface water (where detected, i.e., SW-02 and SW-03) than in groundwater at MW-11A.

As stated above, the reported total and free cyanide results are being evaluated for accuracy through the data validation and laboratory audit. Results of the data validation and laboratory audit will be presented under separate cover. If warranted, based on the results of the data validation and laboratory audit, additional supplemental sampling recommendations will subsequently be proposed.

- The groundwater elevation at monitoring well MW-11A was observed to be higher than the surface water elevation at location SW-02. Data collected show that there is a potential that a small, local groundwater mound may exist in the vicinity of monitoring well MW-11A, and that the Class D stream may be a gaining surface water body at the time the water elevation measurements were taken (Figure 3).
- The TDS and specific conductivity results measured in the groundwater at MW-11A were similar to the values measured at the adjacent surface water location SW-02, as well as the other supplemental surface water locations (SW-03, SW-04, and SW-05) located upstream, providing no definitive indication of influence to or from groundwater.

Please do not hesitate to call me with questions at 716-923-1222.

Sincerely yours,



Randolph West, P.E.
Senior Engineer

cc: B. Walker – National Fuel
T. Alexander – National Fuel (electronic submittal)
S. McLaughlin – NYSDOH (electronic submittal)
R. Jones – NYSDOH Project Manager (electronic submittal)
C. Bethoney – NYSDOH Region 9 Chief (electronic submittal)
T. Raby – AECOM



Tables

Table 1
Operations, Maintenance, and Monitoring Scope of Work
Mineral Springs Former MGP Site

	Frequency	Description	Notes
Groundwater and Surface Water Monitoring	Twice a year	Groundwater and surface water monitoring as specified in Table 2. Monitoring typically takes place in April and August.	Scope in 2002 included monitoring three times a year. The frequency was modified in 2005 with NYSDEC approval.
DNAPL Recovery Test Well	Twice a year	DNAPL recovery from well RTW-1.	Continuous operations of RTW-1 were halted in 2002 with NYSDEC approval since only de minimis amount of DNAPL was being recovered.
Site Inspections	Annual	Inspection of the following: <ul style="list-style-type: none"> • Clay, geomembrane, and asphalt caps • Ground surface for signs of tar or purifier residues • Fencing • Stream 	
Maintenance and Repair	As needed	Activities determined based on inspection results	
Reporting	Twice a year	Groundwater Monitoring Report	
	Annually	O&M Report	As of October 2011, a Periodic Review Report (PRR) is submitted annually to meet current NYSDEC requirements.

Table 2
Water Sampling Summary Table¹
Mineral Springs Road MGP Site, 2017

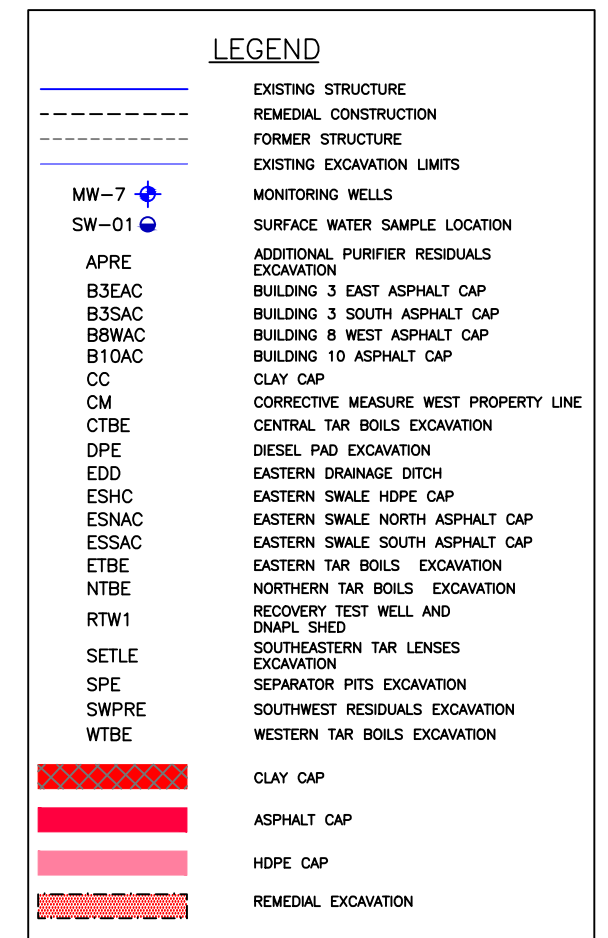
Location	Cyanide, Total USEPA SW846 9014	Cyanide, Free USEPA SW846 9016	BTEX USEPA SW846 8260C	PAHs USEPA SW846 8270D	TDS SM 2540C	Specific Conductivity Field Measurement	Water Elevation	Benchmark Elevation (ft. MSL, top of PVC casing)
Upgradient Site Perimeter								
MW-17	x	x	x	x		x	x	587.28
Downgradient Site Perimeter								
MW-13	x	x	x	x		x	x	591.85
MW-14	x	x				x	x	589.53
MW-15							x	590.93
MW-20	x	x				x	x	587.06
MW-21	x	x				x	x	587.84
MW-22	x	x				x	x	592.50
MW-23	x	x	x	x		x	x	589.28
Onsite Purifier Residuals Impacted Areas								
MW-12	x	x				x	x	591.40
MW-16	x	x				x	x	588.99
Onsite Hydrocarbon Impacted Areas								
MW-07			x	x		x	x	587.01
MW-10			x	x		x	x	587.61
MW-11A ²	x ²	x ²	x	x	x ²	x	x	589.78
MW-19			x	x		x	x	589.83
Onsite Surface Water								
SW-01 ²	x	x	x	x	x ²	x ²	x	top of headwall = 587.0
SW-02 ²	x	x	x	x	x ²	x ²	x ²	MW-11A ref. pt
SW-03 ²	x ²	x ²			x ²	x ²		
SW-04 ²	x ²	x ²			x ²	x ²		
SW-05 ²	x ²	x ²			x ²	x ²		
QA/QC Samples (frequency)								
Trip Blank			x					(one per shipment)
Field Duplicate	x	x	x	x				(one per event)
Equipment Blank	x	x	x	x				(one per event)
DNAPL Recovery								
RTW-1								(purge well of accumulated DNAPL)
Total	17	17	12	11	6	18	16	
Container, Preservative	250 mL plastic, NaOH	250 mL plastic amber, NaOH	40 mL VOA vial, HCl (x3)	250 mL glass amber, NP (x2)	500 mL plastic, unpreserved			

Notes:

1. Sample methods and containers have been updated to the most current information. Benchmark elevations have been updated to reflect the 2007 survey, except for MW-20, which was resurveyed in August 2009 due to a repair.
2. Supplemental sampling at this location was conducted in August 2017.



Figures



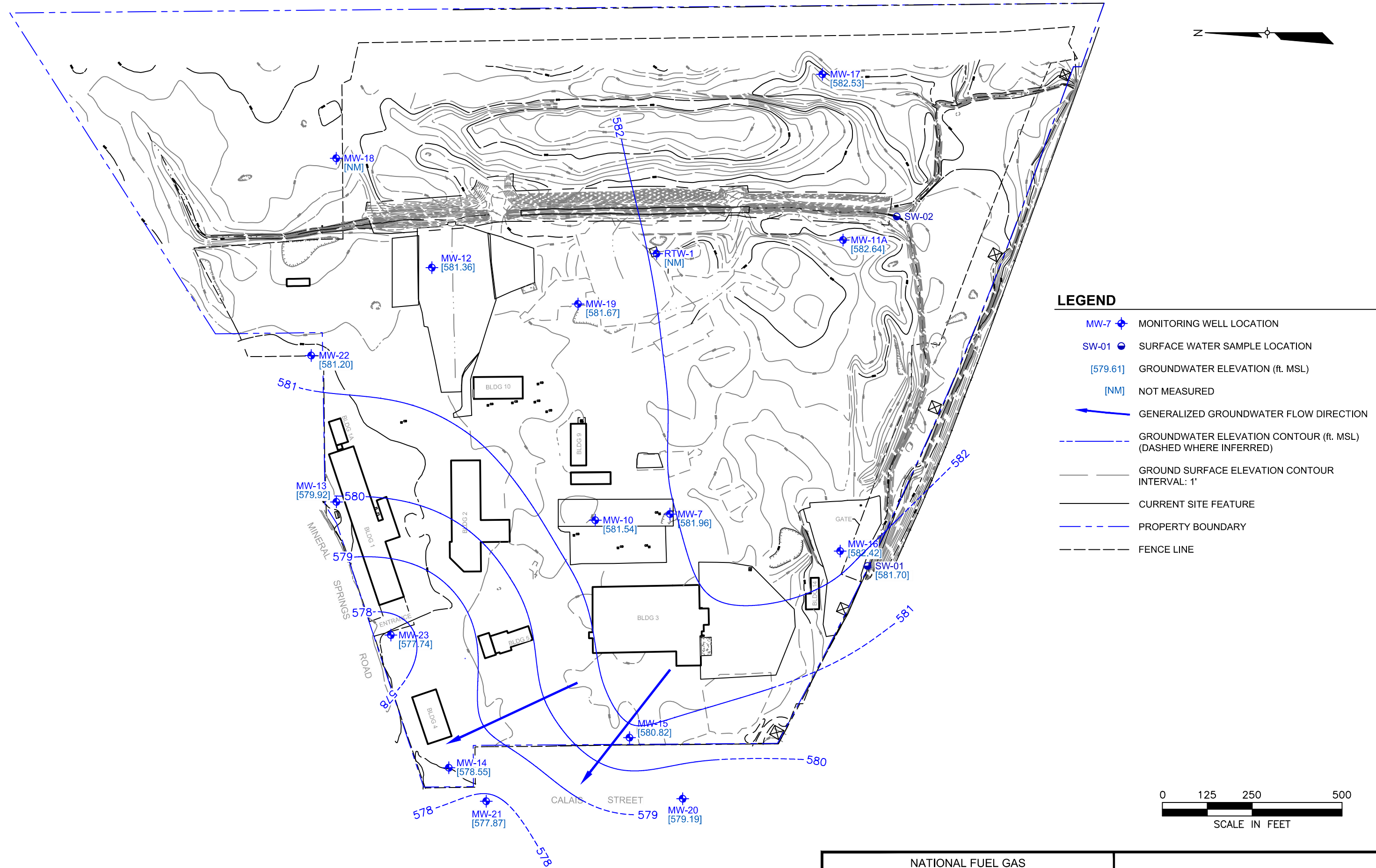
MINERAL SPRINGS ROAD FACILITY
NATIONAL FUEL GAS
60538249-100

DRWN: GRI

SITE FIGURE

FIGURE 1

File: C:\0-tami\FOR REPORT\60538249_100 FIGURE 2 GW _APR2017.dwg Layout: GW-2017-04 User: heather.pressing Plotted: Sep 29, 2017 - 3:23pm Xref's:



AECOM

NATIONAL FUEL GAS
MINERAL SPRINGS ROAD MGP SITE
60538249-100

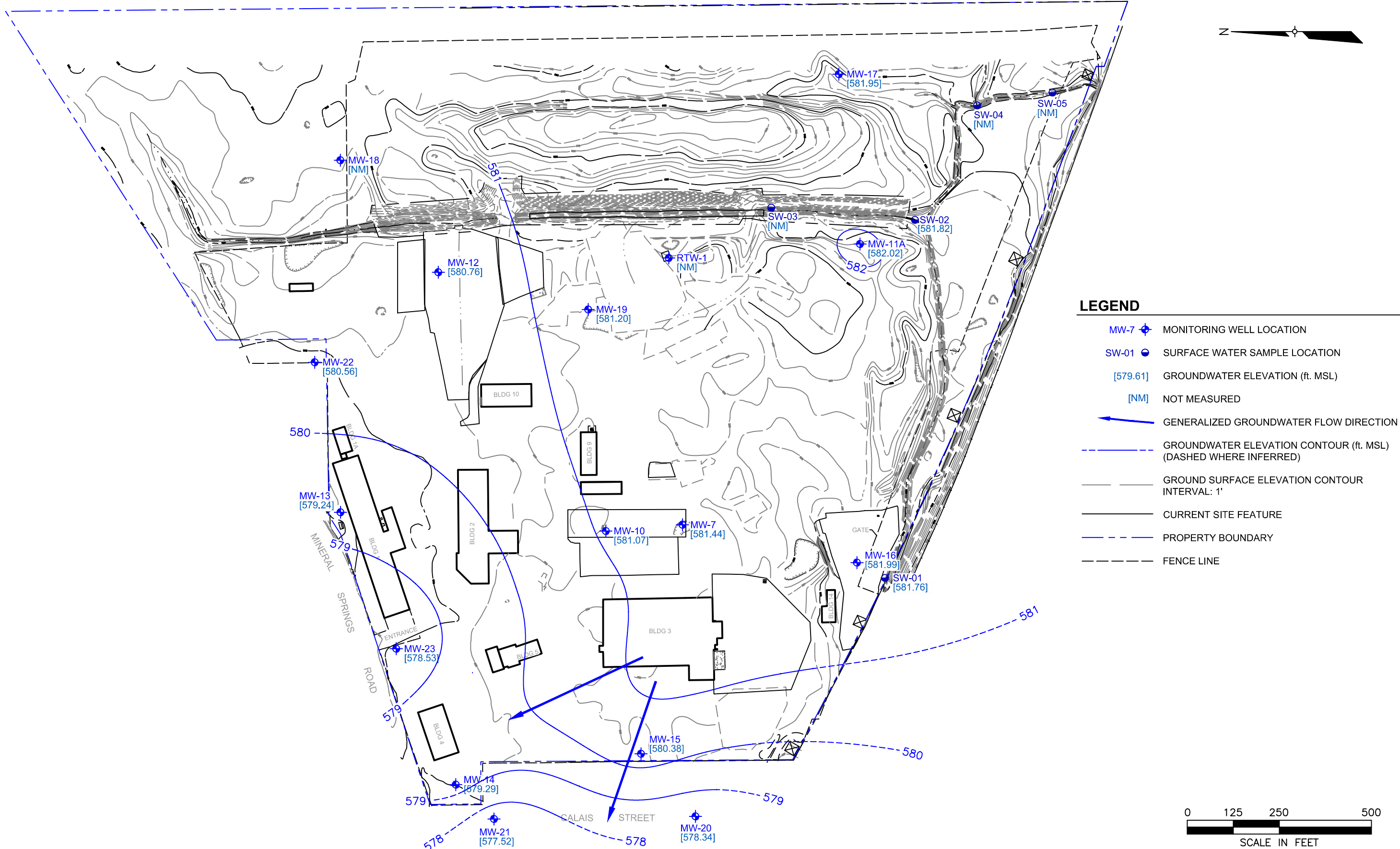
DATE: 04/2017

DRWN: HAP

GROUNDWATER ELEVATION CONTOURS
APRIL 2017

FIGURE 2

File: C:\0-tami\FOR REPORT\60538249_100 FIGURE 3 GW_AUG2017.dwg Layout: GW-2017-08 User: heather.pressing Plotted: Sep 29, 2017 - 3:24pm Xref's:



NATIONAL FUEL GAS MINERAL SPRINGS ROAD MGP SITE 60538249-100			GROUNDWATER ELEVATION CONTOURS AUGUST 2017	
DATE: 08/09/2017	DRWN: HAP		FIGURE 3	



Appendix A

Groundwater and Surface Water Monitoring Results

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

J:\Projects\60538249_MSpringsOM\500-Deliverables\508 - FINAL 2017 PRR\7 Appendix A 2017 GW SW Summary Tables.xlsm

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

Notes:
nd - non-detect
open space - no data

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

Notes:
nd - non-detect
open space - no data

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)

(All Units in $\mu\text{g/L}$)



Appendix B

Annual Site Inspection Form

Annual Site Inspection Form
Mineral Springs Road Former MGP

Inspection by: Randolph West

Signature: 

Affiliation: AECOM

Date: April 18, 2017

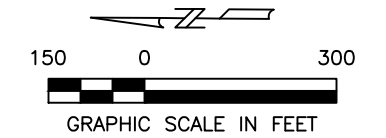
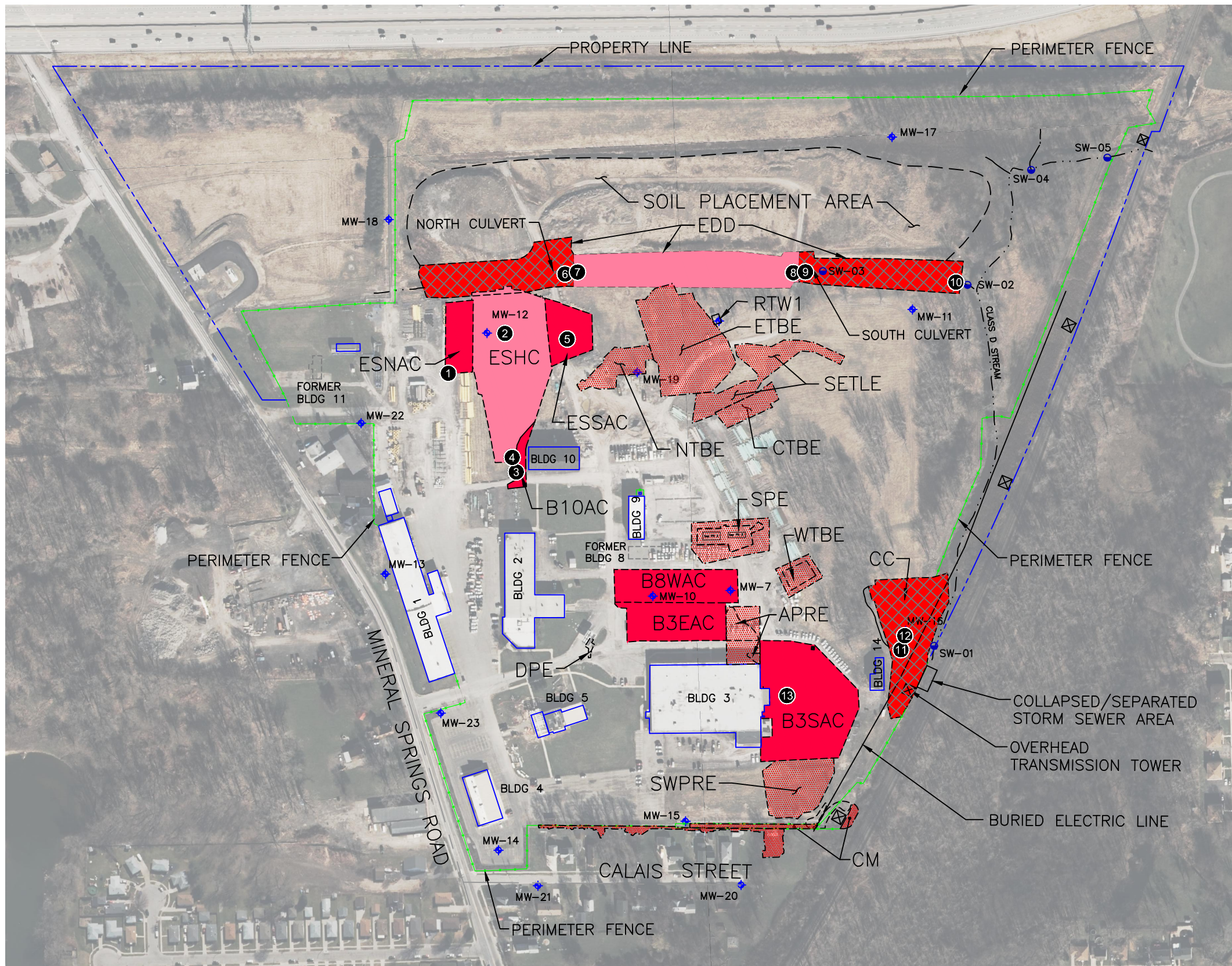
<p>ASPHALT CAP SOUTH OF BUILDING #3</p> <p>Cracks or ruts ? Yes <input checked="" type="radio"/> No <input type="radio"/></p> <p>Erosion at edges ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Blue-stained soil ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments: Some areas of significant cracking.</p>	<p>CLAY CAP BEHIND BUILDING #14</p> <p>Animal dens ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Erosion ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Trees ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Blue-stained soil ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments:</p>
<p>ASPHALT CAP EAST OF BUILDING #3 B3EAC Also B8WAC, B10AC</p> <p>Cracks or ruts ? Yes <input checked="" type="radio"/> No <input type="radio"/></p> <p>Erosion at edges ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Blue-stained soil ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments: B10AC - One small area of significant cracking; otherwise acceptable.</p>	<p>EASTERN DRAINAGE DITCH EDD</p> <p>Animal dens ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Erosion ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Trees ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Blue-stained soil ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Hydrocarbon sheen ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Inadequate Signage ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Trash / Debris ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments: High water levels in stream create standing water in south portion of EDD. Some standing water observed in mid-section.</p>
<p>ASPHALT CAP NORTH OF EASTERN SWALE ESNAC</p> <p>Cracks or ruts ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Erosion at edges ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Blue-stained soil ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments:</p>	<p>BACKFILLED EXCAVATIONS</p> <p>Excessive settlement ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Ponding of surface water ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Tar boils ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Blue-stained soil ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments:</p>
<p>ASPHALT CAP SOUTH OF EASTERN SWALE ESSAC</p> <p>Cracks or ruts ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Erosion at edges ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Blue-stained soil ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments:</p>	<p>CLASS D STREAM</p> <p>Hydrocarbon sheen ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments:</p>
<p>HDPE/SOIL CAP IN EASTERN SWALE ESHC</p> <p>Cracks or ruts ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Erosion at edges ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Blue-stained soil ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments:</p>	<p>SITE FENCE</p> <p>Damage / Holes ? Yes <input type="radio"/> No <input checked="" type="radio"/></p> <p>Comments:</p>



Appendix C

Photographs

File: C:\0-tami\FOR REPORT\100-FIGURE PHOTO.dwg Layout: Site Plan (B-300) User: heather.pressing Plotted: Sep 29, 2017 - 3:33pm Xref's:



LEGEND

---	EXISTING STRUCTURE
---	REMEDIAL CONSTRUCTION
---	FORMER STRUCTURE
---	EXISTING EXCAVATION LIMITS
MW-7	MONITORING WELLS
SW-01	SURFACE WATER SAMPLE LOCATION
APRE	ADDITIONAL PURIFIER RESIDUALS EXCAVATION
B3EAC	BUILDING 3 EAST ASPHALT CAP
B3SAC	BUILDING 3 SOUTH ASPHALT CAP
B8WAC	BUILDING 8 WEST ASPHALT CAP
B10AC	BUILDING 10 ASPHALT CAP
CC	CLAY CAP
CM	CORRECTIVE MEASURE WEST PROPERTY LINE
CTBE	CENTRAL TAR BOILS EXCAVATION
DPE	DIESEL PAD EXCAVATION
EDD	EASTERN DRAINAGE DITCH
ESHC	EASTERN SWALE HDPE CAP
ESNAC	EASTERN SWALE NORTH ASPHALT CAP
ESSAC	EASTERN SWALE SOUTH ASPHALT CAP
ETBE	EASTERN TAR BOILS EXCAVATION
NTBE	NORTHERN TAR BOILS EXCAVATION
RTW1	RECOVERY TEST WELL AND DNAPL SHED
SETLE	SOUTHEASTERN TAR LENSES EXCAVATION
SPE	SEPARATOR PITS EXCAVATION
SWPRE	SOUTHWEST RESIDUALS EXCAVATION
WTBE	WESTERN TAR BOILS EXCAVATION
	CLAY CAP
	ASPHALT CAP
	HDPE CAP
	REMEDIAL EXCAVATION
10	PHOTO LOCATION

PREVIOUSLY REMEDIATED AREAS ARE SHADED RED



MINERAL SPRINGS ROAD FACILITY
NATIONAL FUEL GAS
60538249-100

DATE: 6/23/15

DRWN: GRI

PHOTOGRAPH LOCATION
FIGURE

FIGURE



Looking east at Eastern Swale North Asphalt Cap (ESNAC), in good condition.



Looking west at French drain in Eastern Swale HDPE Cap (ESHC), in good condition.



Look east at portion of the Building 10 Asphalt Cap (B10AC) observed with significant cracking that requires patching or repaving.



Looking east at stable portion of the Building 10 Asphalt Cap (B10AC).



Looking east at Eastern Swale South Asphalt Cap (ESSAC), in good condition.



The outlet to the north culvert to the mid-section (HDPE cap) of the Eastern Drainage Ditch (EDD).



Looking south at the mid-section (HDPE cap) of the Eastern Drainage Ditch (EDD).



Looking north at the mid-section (HDPE cap) of the Eastern Drainage Ditch (EDD).



The outlet of the south culvert to the southern portion (clay cap) of the Eastern Drainage Ditch (EDD).



Looking north at the southern portion (clay cap) of the Eastern Drainage Ditch (EDD), just upstream of connection with unnamed tributary.



Looking east at the Clay Cap (CC) area. No issues noted.



Looking west at the Clay Cap (CC) area. No issues noted. Animal burrow noted last year at the foot of the electrical tower (left edge of picture) has been filled.



Looking northwest at a portion of the Building 3 South Asphalt Cap (B3SAC) showing an area with some significant cracking that needs to be sealed or patched.



Appendix D

Institutional and Engineering Controls Certification Form



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site Details		Box 1	
Site No.	V00195		
Site Name NFG - Mineral Springs MGP			
Site Address: 365 Mineral Springs Road		Zip Code: 14210	
City/Town: West Seneca			
County: Erie			
Site Acreage: 80.0			
Reporting Period: September 16, 2016 to September 16, 2017			
		YES	NO
1. Is the information above correct?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.			
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.			
5. Is the site currently undergoing development?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Box 2	
		YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial		<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Are all ICs/ECs in place and functioning as designed?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.			
A Corrective Measures Work Plan must be submitted along with this form to address these issues.			
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date	

Description of Institutional ControlsParcel

123.16-2-8

Owner

National Fuel Gas Distribution Corp.

Institutional ControlGround Water Use Restriction
Landuse Restriction

- i. All identified capped areas shall continue to be protective of public health and the environment, and shall continue to be maintained and monitored to be consistent with industrial/commercial use.
- ii. The owner of the Property shall prohibit the Property from ever being used for purposes other than for an industrial/commercial operation, office, warehouse and garage facility and for the services associated with such use without the express written waiver of such prohibition by the Relevant Agency.
- iii. The owner of the Property shall prohibit the use of the groundwater underlying the Property without treatment rendering it safe for drinking water or industrial purposes, as appropriate, unless the user first obtains permission to do so from the Relevant Agency.

Description of Engineering ControlsParcel

123.16-2-8

Engineering ControlCover System
Fencing/Access Control

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

- a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;
- b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

☒ ☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

- (a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;
- (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;
- (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;
- (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and
- (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

☒ ☐

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. V00195

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I CRAIG K. SWIECH at NATIONAL FUEL
print name print business address
365 MINERAL SPRINGS RD BUFFALO,
NY 14210

am certifying as OWNER (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Craig K. Swiech
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

11/6/17
Date

IC/EC CERTIFICATIONS

Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Randolph West at AECOM; 257 W. Genesee St., Buffalo, NY 14202
print name print business address

am certifying as a Professional Engineer for the National Fuel Gas
(Owner or Remedial Party)


Signature of Professional Engineer, for the Owner or
Remedial Party, Rendering Certification

